

MARQUIS AURBACH

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

**Marquis Aurbach**

Craig R. Anderson, Esq.

Nevada Bar No. 6882

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

canderson@maclaw.com

Attorneys for Defendants LVMPD, Ofc. Obsenares and Ofc. McMahill

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JACEY LOOPER, individually,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; GLENN OBSENARES;  
BRAYDEN MCMAHILL and DOES 1-10,  
inclusive,

Defendants.

Case Number:  
2:23-cv-01436-JAD-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(SECOND REQUEST)**

Plaintiff Jacey Looper (“Plaintiff”), by and through her attorneys of record, Christiansen Trial Lawyers and Peter Goldstein Law Corp. and Defendants Las Vegas Metropolitan Police Department (“LVMPD”), Ofc. Obsenares and Ofc. McMahill (“Defendants”), by and through their attorneys of record, Marquis Aurbach, hereby file their Stipulation and Order to Extend Discovery Deadlines (Second Request) by ninety (90) days pursuant to LR II 26-4. The present discovery cutoff date is August 5, 2024.

**I. DISCOVERY COMPLETED**

1. On December 13, 2023 this Court entered the original discovery plan. (ECF No. 17)
2. Plaintiff served her initial FRCP 26(a)(1) disclosure.
3. Defendants served their initial FRCP 26(a)(1) disclosure.
4. The parties have both severed and responded to written discovery.
5. On January 25, 2024, the Parties extended discovery 90-days for the first time. (ECF No. 20)

MARQUIS AURBACH

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

6. Both parties have served several supplements to their initial Rule 26 disclosure statements.

7. Both parties have served initial expert disclosures.

8. The Defendants have taken the deposition of Plaintiff.

9. Plaintiff deposed both individual defendants.

10. Both parties have served numerous Custodian of Records depositions.

## II. DISCOVERY TO BE COMPLETED

1. The Parties need to serve rebuttal expert reports.

2. Plaintiff needs to depose Defendants' medical and police practice experts.

3. Defendants need to depose Plaintiff's medical and police practices expert.

4. Defendants will need to take the deposition of Plaintiff's experts.

5. The Plaintiff has noticed a Rule 30(b)(6) for LVMPD.

## III. REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE COURT

The parties agree, pursuant to Local Rule 6-1, that good cause exists for the requested extension. The primary reason for this request is for the Parties to complete expert discovery. Although both Parties have served initial expert discovery, it has been difficult setting expert depositions due to scheduling. In addition, the Parties are attempting to find an agreeable date to conduct the Rule 30(b)(6) deposition for LVMPD.

Counsel for Plaintiff and Defendants just finished a ten-day jury trial (June 17, 2024 through June 26, 2024) in *Estate of Childress, et al. v. LVMPD, et al.*, Case No. 2:16-cv-03039-APG-NJK. Defense counsel is starting a two-week jury trial on July 29, 2024 in the United States District Court entitled *Estate of Jose Gomez, et al. v. LVMPD, et al.*, Case No. 2:20-cv-01589-RFB-BNW. Due to these conflicts, other pending deadlines, and the summer schedules of the expert witnesses, the Parties have been unable to find agreeable dates for expert depositions until late August/September. Therefore, the Parties agree that a 90-day extension will allow the Parties to complete the remaining depositions, obtain the transcripts, and file dispositive motions.

IV. ~~PROPOSED~~ SCHEDULE FOR COMPLETING DISCOVERY:

	EXISTING DEADLINES	<del>PROPOSED</del> DEADLINES
Close of Discovery	August 5, 2024	November 5, 2024
Final Date to Amend Pleadings/Add Parties	Passed	
Initial Expert Disclosures Deadlines	Passed	
Rebuttal Expert Disclosure Deadline	July 3, 2024	August 3, 2024
Final Date for Dispositive Motions	September 3, 2024	December 3, 2024
Pretrial Order	October 1, 2024	January 2, 2025

IT IS SO STIPULATED this 2<sup>nd</sup> day of July, 2024.

MARQUIS AURBACH

CHRISTIENSEN TRIAL LAWYERS

By: s/Craig R. Anderson  
 Craig R. Anderson, Esq.  
 Nevada Bar No. 6882  
 10001 Park Run Drive  
 Las Vegas, Nevada 89145  
 Attorney for Defendants

By: s/R. Todd Terry  
 Peter S. Christiansen, Esq.  
 Nevada Bar No. 5254  
 R. Todd Terry, Esq.  
 Nevada Bar No. 6519  
 710 South 7th Street, Suite B  
 Las Vegas, Nevada 89101  
 Attorneys for Plaintiff

PETER GOLDSTEIN LAW CORP

IT IS SO ORDERED.

By: s/Peter Goldstein  
 Peter Goldstein, Esq.  
 Nevada Bar No. 6992  
 10161 Park Run Drive, Suite 150  
 Las Vegas, Nevada 89145  
 Attorneys for Plaintiffs

  
 U.S. MAGISTRATE JUDGE

Date: July 2, 2024